

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES)	
)	
)	
)	
)	
v.)	
)	Cr. No. 04-10345-NMG
)	
MOHAMMED ABDUL RASHEED)	
QURAISHI, MOHAMMED ABDUL)	
QAYIUM QURAISHI, and MOHAMMED)	
ABDUL AZIZ QURAISHI)	
)	

**ASSENTED-TO EMERGENCY MOTION OF DEFENDANTS
QAYIUM QURAISHI AND RASHEED QURAISHI TO EXTEND
THEIR SELF-SURRENDER DATE FOR TWO WEEKS**

Through this motion, Defendants Qayium Quraishi and Rasheed Quraishi (collectively, “Defendants”), respectfully request that this Court extend their self-surrender date for two weeks, until May 11, 2007. In support of this motion, Defendants state as follows:

1. Defendants were sentenced in this matter on March 30, 2007.
2. On April 11, 2007, a Judgment was entered against each of the Defendants. (*See Docket Nos. 114, 115*). Pursuant to these respective Judgments, Defendants are required to self-surrender at the institution designated by the Bureau of Prisons before 2 p.m. on April 27, 2007.¹
3. After their Sentencing, Defendants were told by the Probation Service that they would receive notice of their respective prison designations by mail. As of this date, however, they have not received any notice of their designations.

¹ Defendant Aziz Quraishi’s self-surrender date is May 18, 2007 (*see Docket No. 113*), and therefore he does not join this motion.

4. In order for Defendants to remain close to their respective families in Massachusetts and Illinois, this Court made a judicial recommendation that defendant Qayum Quraishi be incarcerated at FCI Devens and defendant Rasheed Quraishi be incarcerated at FCI Oxford Wisconsin.

5. Today, counsel for Qayum Quraishi made several calls in an attempt to determine Defendants' prison designations. Counsel learned from the U.S. Marshals' Office that the Bureau of Prisons did not follow this Court's recommendation, and instead designated them to serve their sentence at a facility in Big Spring, Texas. If Defendants are required to report to Big Spring, Texas on April 27, 2007, they will be forced to make arrangements to travel across the country to report with only several-days' notice.

6. Given that Defendants have learned of their designation to Texas just three days prior to their scheduled self-surrender date, they respectfully request an additional two weeks, until May 11, 2007, in order to organize their affairs and make travel arrangements to their designated prison facility.

7. The Government assents to the filing of this motion.

WHEREFORE, Defendants respectfully request that this Court grant their request for a two-week extension of their self-surrender date.

Respectfully submitted,

MOHAMMED ABDUL QAYIUM
QURAISHI,

By his attorneys,

MOHAMMED ABDUL RASHEED
QURAISHI,

By his attorneys,

/s/ Peter E. Gelhaar

Peter E. Gelhaar (BBO# 188310)
Jill Brenner Meixel (BBO# 652501)
Donnelly, Conroy & Gelhaar, LLP
One Beacon Street, 33rd Floor
Boston, MA 02108
(617) 720-2880

/s/ Frank A. Libby, Jr.

Frank A. Libby, Jr. (BBO# 299100)
John J. Comisso (BBO# 647002)
Kelly, Libby & Hoopes, P.C.
175 Federal Street
Boston, MA 02110
(617) 338-9300

Dated: April 24, 2007

Certificate of Service

I hereby certify that this Motion filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 24, 2007.

/s/ Jill Brenner Meixel
Jill Brenner Meixel